

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

2016 MAY 19 PM 1:11

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NT

Phil Busch
Plaintiff

v.

CPS Etc AHL
Defendant

3-16CV1378-L

Civil Action No.

COMPLAINT

* Attach additional pages as needed.

Date 5/18/2016
Signature Phil Busch
Print Name Phil Busch
Address 9815 ODELLA RD Apt 1042
City, State, Zip Dallas TX 75233
Telephone 469-268-0618

CAUSE NO

PHIL BUSCH
PLAINTIFF

United States
IN THE DISTRICT COURT

Northern
~~JUDICIAL~~ DISTRICT *of TEXAS*

VS

~~DALLAS COUNTY COURT~~

CPS , ETC ALL
DEFENDANTS

PLAINTIFFS ORIGINAL PETITION AND REQUEST FOR DISCLOSURE
TO THE HONORABLE JUDGE OF SAID COURT

COMES NOW , PHIL BUSCH Plaintiff and files Original Petition
Complaining of Defendant CPS, etc all and and would show unto the Court as follows

I. SELECTION OF DISCOVERY LEVEL

1.This suit is governed by discovery control panel II under Rule 190.3
The Texas Rules of Civil Procedure

II Parties Plaintiff Phil Busch is a individual who resides at 9815 Odella Rdapt 1042
Dallas Tx 75233

Defendant Mario Greco is a individual who resides at 15303,Dallas Pkwy Addison Tx 75001

Defendant T.D Jakes is a individual who reside at : 6777 W Kiest Blvd, Dallas, TX 75236

Defendant Pat Robertson is a individual who reside at 1000 Regent University Drive
Virginia Beach, VA 23464

Defendant Donald Trump is a individual who resides 725 5th Ave, New York, NY 10022

Defendant Cps Tekiema Taylor, Jesicia McClinton, Natosha Hooks ,Adalyn Seftas who reside at
8700 n Stemmons fwy 104 Dallas tx 75247

Defendant Mellannise Henderson Love is a individual who resides at 3102 Maple Avenue, Suite
400 Dallas, Texas 75201

III Jurisdiction and Venue This Court has continuing jurisdiction over defendants all damages
are within statutory jurisdictional limit of the Court

IV FACTS

This lawsuit results from CPS caseworkers Taylor and McClinton, and directors Hooks and Seftas who do not meet the standards which prevents them from properly fulfilling their required duties for A Stafford the child. They do not ensure that the child is free from unreasonable risk of harm or protecting the child while in their custody or caregivers

CPS practices and policies substantially depart from professional judgment.

CPS is aware of these risk, yet refuses to assess them on behalf of the child.

CPS does not exercise oversight of the facilities in which foster child is placed by failing to properly investigate those facilities as Taylor swore under oath in affidavit that child while in the facilities placed was slamming her head against the wall while everyone watched for 15 minutes including care givers and did nothing to prevent this nor did caregivers who sat by drinking beer. And never holds them accountable for licensing violations as child has never been taken to Doctors even while having fever and coughing for 3 weeks with several bruises on arms and legs which were done by care givers and Taylor who was fired for these matters and the new caseworker McClintion said you can't do nothing to me my directors Hooks ,Seftas informed parent they would never report any of this and they are free from any legal action or criminal action when told they were going to be sued Hook ,Seftas boasted how the judge in the 305th district court would get me stating don't you know we work for the government and that since the judge was of color and even stating that President Obama don't care about some cracker.

CPS does not properly track incidents of child abuse.

CPS foster homes are deficient as caregivers are using the state money they get for drugs and beer and buy the child nothing.

CPS caregivers are not properly trained or qualified

CPS does not restrict the placement of unrelated children of genders ages ,and service levels in the same home , these practices and policies , separately and combined cause an unreasonable risk of harm to child

CPS practices and policies substantially depart from professional judgment

Cps is aware of these risks yet refuses to assess or address them on behalf of the basic care of child.

CPS has caused neglect maltreatment

CPS causes unreasonable risk of harm to all basic care

Cps is aware of risk yet refuses to assess or address it

Cps practice substantially departs from professional judgment

CPS Taylor also under oath told parent who a minister of 23 years under Billy Graham mentoring that her Pastor T. D Jakes told her that he and his current Business partner Pat Robertson told her to destroy this man and to make him look like a babbling idiot for them because Pastor T.D Jakes is being sued by parent and does not want his business in media along with his partner Pat Robertson who has threatened to kill Phil Busch from former law suit.

CPS Taylor and McClinton have both told parent which Taylor again swore under oath that parent did not even know how to give baby bottle and sat there like a babbling idiot cracker .

CPS Taylor and lawyer Mellannise Henderson love both agreed to destroy Phil Busch chances of being parent stating Cps is made to ruin scum like Phil Busch and you're a worthless cracker .

Donald Trump and Mario Greco Ceo of Zurich Insurance who both are in a law suit against Phil Busch informed Busch it looks like your never get your little Nigger baby

Donald Trump and Greco have made it clear that they are strong supporters of the KKK and not only want to keep out Mexicans but think that this Birther which referring to President Obama who has white mother and colored dad as Phil Busch and child's mom who is of color (Trump) stated I hate Niggers to and you must be a lover of them and like the rest of white trash Texans and I hear stating (Trump) to Phil Busch your Mr. Olympia I hear you and the rest of lowlife trash

V Negligence

1. Abuse

As of Defendants acting together the following acts or omissions by all defendants has caused mental and emotional injury to the child that has resulted in an observable and material impairment in the child's growth, development, and psychological functioning which has caused the child to be in a situation in which the child sustains a mental or emotional injury that results in an observable and material impairment in the child's growth, development, or psychological functioning committed by all defendants acting together.

2. Negligence conduct by defendants

3. After the report was found to be credible with evidence of the abuse and neglect of the child by allowing the care givers appointed by cps to allow the baby to bang her head against the wall repeatedly, Cps agency which is supposed to provide the child with a safe living environment refused to make the following finding

(a) The allegation of abuse or neglect is substantiated;

(b) The plotting of all defendants to work together and refusal by Cps to protect the child.

4. child maltreatment by defendants

5. The physical and emotional abuse, in addition to neglect the failure of Cps and appointed caregivers by Cps to provide for the child's development when in a financial position to do so the recent act an failure to act, on by The Guidance of Donald Trump the failed millionaire and friends CEO of Zurich Insurance along with child molester T.D Jakes and Pat Robertson who guided defendants.
6. Failure by false statements were CEO of Zurich Insurance with Low Life Donald Trump using the word Nigger lover to Phil Busch .
7. Failure by deceitful conduct by T. D Jakes of Simon and Schuster and Christian Mingle friend of

President Obama stated that Phil Busch will never get his baby Jakes under investigation with Pat Robertson have admitted they have used their influence to repay parent for exposing the Tax Evasion of Billions of dollars along with Zurich Insurance Corp which is under investigation and stockholders are selling their stock as quick as they can. Conduct has been criminal using the CPS as his personal puppet

VI Damages which has caused Phil Busch and child to suffer

Loss of income

Mental anguish in past and present

Damage to family from keeping child from wonderful parent Phil Busch of precious time loss with baby .

VII Prayer

Wherefore premise consider plaintiff respectfully request defendants all and care givers to be sited to appear and answer on final trial that plaintiff have judgment against defendants

VIII

Actual Damages , pre judgment and post judgment allowed by law cost of suit and monetary relief over \$250000 but no more than \$1000000 and any other relief either in law or equity to which plaintiff is entitled

VIII Request for disclosure pursuant rule 194 of the Texas rules of civil procedure please disclose all information identified in rule 194 2 a-l

Respectfully submitted by Phil Busch Pro se

5/13/2016

9815 ODELL RD

DAHLIS TX 75233

PH 469-268-0618

JS 44-TXND (Rev. 11/15)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS**DEFENDANTS**

(b) County of Residence of First Listed Plaintiff Dallas
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Dallas
(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ PTF ☒ DEF 1 Incorporated or Principal Place of Business In This State ☒ PTF ☒ DEF 4
- Citizen of Another State ☐ 2 Incorporated and Principal Place of Business In Another State ☐ 5
- Citizen or Subject of a Foreign Country ☐ 3 Foreign Nation ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input checked="" type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause: False claims

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____